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September 11, 2019

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Via Electronic Mail and Courier

Newfoundland and Labrador Board of Commissioners of Public Utilities
120 Torbay Road
P.O. Box 21040
St. John's, NL A1A 5B2

**Attention: Ms. G. Cheryl Blundon, Director of Corporate Services
and Board Secretary**

Dear Ms. Blundon:

Re: Requests for Information of the Island Industrial Customers Group

Further to the above, enclosed please find the original and ten (10) copies of the Island Industrial Customers Group Requests for Information IC-NLH-1 to IC-NLH-4 dated September 11, 2019.

We trust this is in order.

Yours truly,

Stewart McKelvey

Paul L. Coxworthy

PLC/tas

Enclosures

c: Shirley Walsh, Senior Legal Counsel- Regulatory, Newfoundland & Labrador Hydro
Dennis M. Browne, Q.C., Consumer Advocate
Kelly Hopkins, Newfoundland Power Inc.

1 **IN THE MATTER OF** the *Public Utilities Act*
2 (the "Act"); and

3 **IN THE MATTER OF** an Application
4 by Newfoundland and Labrador Hydro
5 for an Order approving (1) its 2020
6 Capital Budget pursuant to s. 41(1) of
7 the Act; (2) its 2020 capital purchases
8 and construction projects in excess of
9 \$50,000.00 pursuant to s.41(3)(a) of
10 the Act; (3) its estimated contributions
11 in aid of construction for 2020
12 pursuant to s.41(5) of the Act; and (4)
13 for an order pursuant to s. 78 of the
14 Act fixing and Determining its Average
15 Rate Base for 2015 and 2016.

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**REQUESTS FOR INFORMATION OF THE
ISLAND INDUSTRIAL CUSTOMERS GROUP**

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IC-NLH-1 – IC-NLH-4

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ISSUED SEPTEMBER 11th, 2019

21 **Specifically Assigned Assets**

22 IC-NLH-1 With reference to Section 3.3 Specifically Assigned Assets, at page 5 of 2020
23 Capital Projects Overview, and Hydro's planned 2024 project to replace the neutral
24 bushings on Come-By-Chance Transformers T1 and T2, what is the present
25 estimate of the amount of capital expenditure proposed to be specifically assigned
26 to NARL Refining Limited Partnership arising from this project?

27 IC-NLH-2 With reference to Section 3.3 Specifically Assigned Assets, at page 5 of 2020
28 Capital Projects Overview, and Hydro's planned 2024 project to replace the neutral
29 bushings on Come-By-Chance Transformers T1 and T2, does Hydro plan to
30 similarly replace the neutral bushings in all of its transformers suspected to be
31 contaminated with PCBs, by 2025?

32 IC-NLH-3 With reference to Section 3.3 Specifically Assigned Assets, at page 5 of 2020
33 Capital Projects Overview, and Hydro's planned 2024 project to replace the neutral
34 bushings on Come-By-Chance Transformers T1 and T2, what is Hydro's criteria for
35 "suspecting" that neutral bushings are contaminated with PCBs? Are the same
36 criteria applied to all of Hydro's transformers? Is it possible that the neutral bushings
37 are not contaminated with PCBs? Is there a means of determining, without
38 replacement, whether the neutral bushings are contaminated?

39 IC-NLH-4 At this time, is Hydro aware of any other new projects within its five-year plan (ie
40 any projects other than the Come-By-Chance T1 and T2 DGA project identified in
41 the 2019 Capital Budget Application and the planned 2024 replacement of the

neutral bushings in Come-By-Chance T1 and T2) that will be proposed to be specifically assigned to any member of the Island Industrial Customer Group, NARL Refining Limited Partnership, Corner Brook Pulp & Paper Limited or Vale Newfoundland and Labrador Limited?

DATED at St. John's, in the Province of Newfoundland and Labrador, this 11th day of September, 2019.

POOLE ALTHOUSE

Per: Paul J. Gerault
Dean A. Porter

COX & PALMER

Per: Paul J. Gerault
Denis J. Fleming

STEWART MCKELVEY

Per: Paul J. Gerault
Paul L. Coxworthy

- TO: The Board of Commissioners of Public Utilities
Attention: Board Secretary
- TO: Newfoundland & Labrador Hydro
Attention: Shirley A. Walsh, Senior Legal Counsel, Regulatory
- TO: Office of Consumer Advocate
Attention: Dennis Browne, Q.C.
- TO: Newfoundland Power Inc.
Attention: Kelly Hopkins, Corporate Counsel